



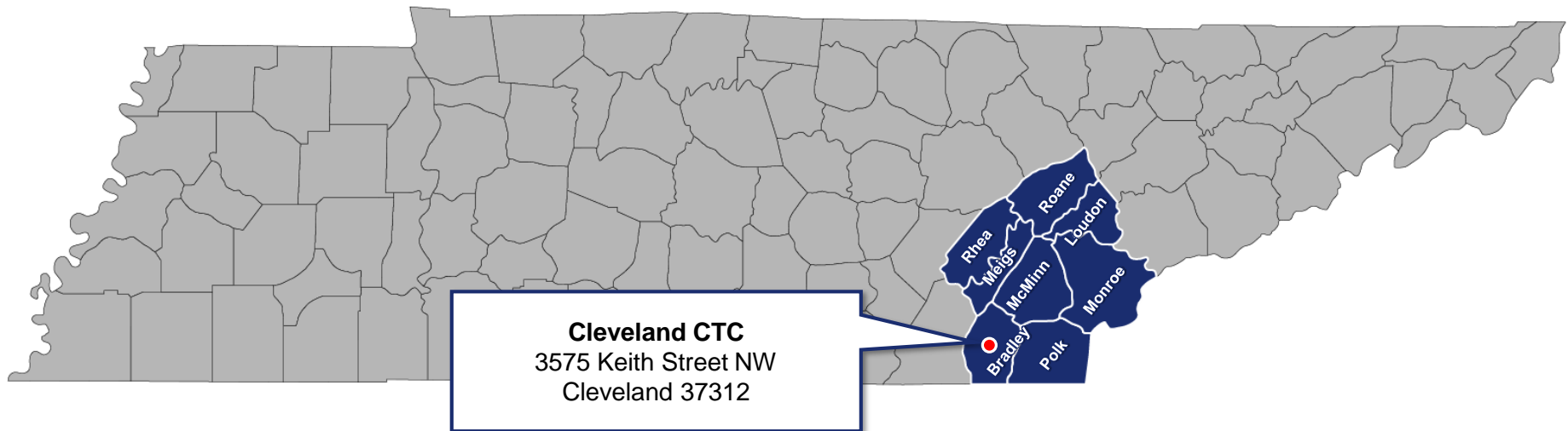
***Cleveland
Comprehensive
Treatment Center***

An Integrated Approach to Patient Access

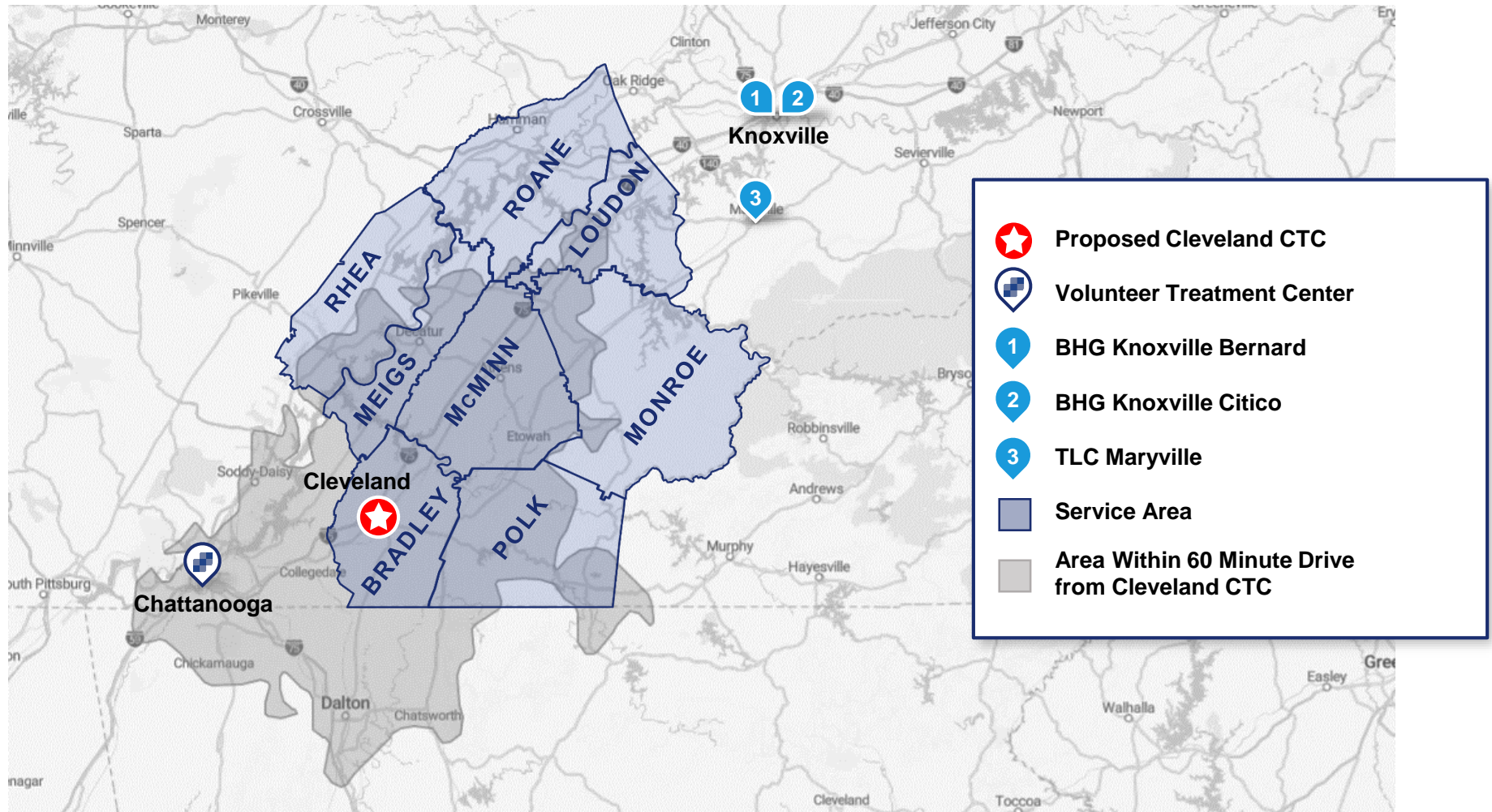
Cleveland CTC Primary Service Area



**Bradley, Loudon, McMinn, Meigs, Monroe,
Polk, Rhea, and Roane Counties**



Availability of Opioid Treatment in Service Area



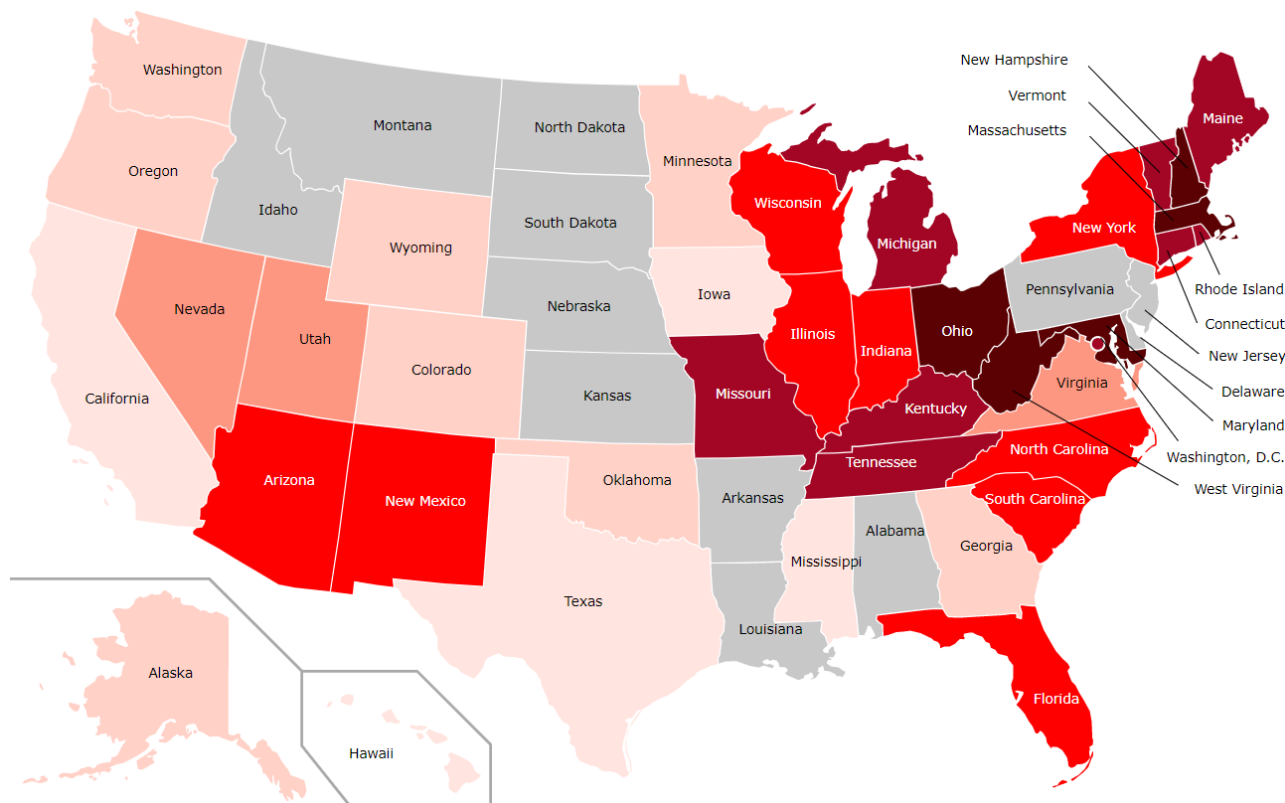
Opioid-Involved Overdose Deaths – 2018



Death Rates per 100,000 People*

>27.8	Roane Co.	40.0
19.1 – 27.7	Tennessee	19.9
15.1 – 19	Bradley Co.	17.0
9.6 – 15	United States	14.6
6.3 – 9.5		
<6.2		
N/A		

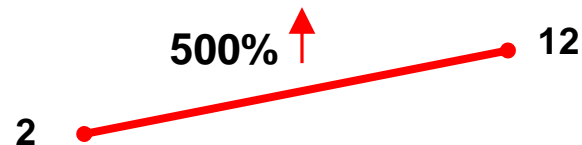
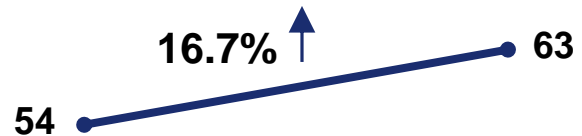
* Death rates not reported for counties with < 10 deaths in any year 2014-2018. (Loudon, McMinn, Meigs, Monroe, Polk, and Rhea)



Opioid Epidemic Trends in Service Area



Deaths Associated
with Opioid Overdose

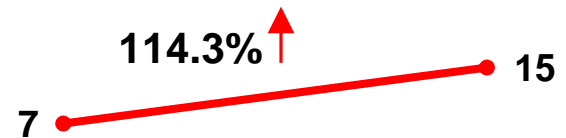
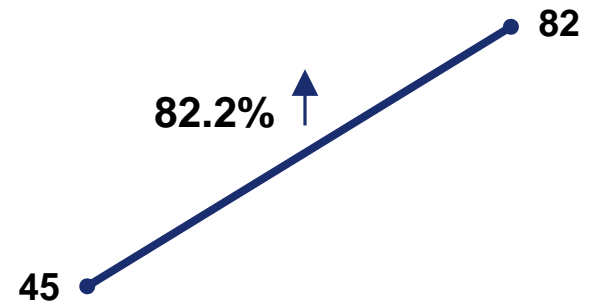


2014

2018

- # Opioid Overdose Deaths
- # Heroin Overdose Deaths

Hospital Stays Associated
with Heroin



2016

2018

- # Heroin-Related Outpatient Visits
- # Heroin-Related Inpatient Admissions

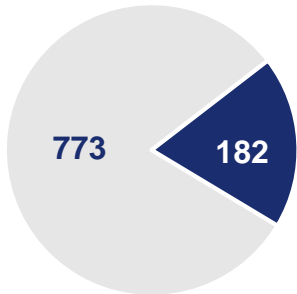
Service Area in High Need



Existing OTPs are meeting the needs of **15%** of the **3,405** service area patients with opioid use disorder.

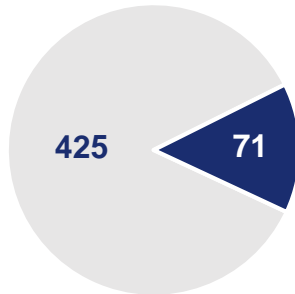
Bradley County

19.1% Need Met



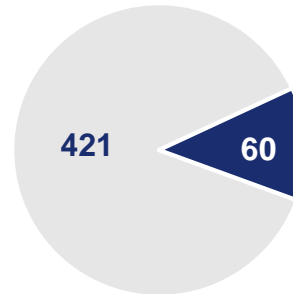
Loudon County

14.3% Need Met



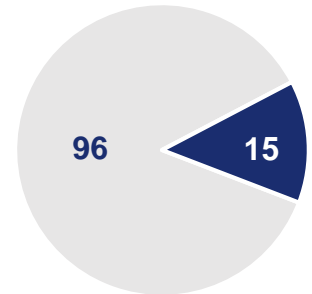
McMinn County

12.5% Need Met



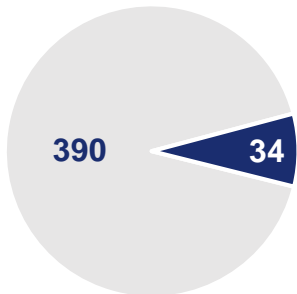
Meigs County

13.5% Need Met



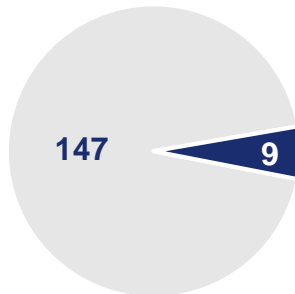
Monroe County

8.0% Need Met



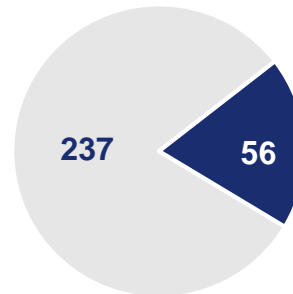
Polk County

5.8% Need Met



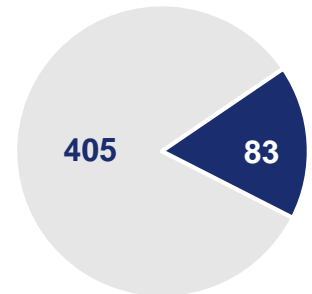
Rhea County

19.1% Need Met



Roane County

17.0% Need Met



The Project



- Tennessee's 20th licensed OTP.
 - State & Federally Licensed
 - CARF Accredited
- First licensed OTP in Bradley County and the 8-county rural service area.
- Focus on “wrap-around” services.
 - Patient-specific daily dosages of medically-indicated pharmaceuticals
 - Continuous monitoring & screening
 - Psychological & physical evaluations
 - Individual & group counseling
 - Linkage to other community providers & services

Strong Community Support: Representative Dan Howell



Legislative District
MEIGS, POLK & BRADLEY
COUNTIES
353 Shady Hollow Circle SE
Cleveland, TN 37323
Cordell Hull Building 556
Nashville, TN 37243
Phone (615) 741-7799
1-800-440-6366 ext. 17799
rep.dan.howell@capitol.tn.gov

House of Representatives
State of Tennessee

DAN HOWELL
REPRESENTATIVE 22ND DISTRICT

Committees
Chairman- Transportation
Infrastructure Subcommittee
Safety & Funding Subcommittee
Government Operations
Judiciary
Civil Justice Subcommittee
Calendar & Rules

May 5, 2020

Tennessee Health Services and Development Agency
Opioid Treatment Program- CON Committee
Andrew Jackson Bldg., 9th Floor
502 Deaderick Street
Nashville, TN 37243

RE: **Acadia Healthcare ("Acadia") Certificate of Need
Non-Residential Opioid Treatment Program in Cleveland**

As a native of Cleveland, I care deeply about our city's needs. As a Representative serving the residents of the Cleveland area, I will do everything in my power to ensure that the needs of our residents are met. Cleveland has experienced much growth in recent years and will only continue to grow-- but growing alongside us is a crisis, the opioid epidemic. Opioid addiction rates are increasing at an alarming rate and we need to ensure that our city is adequately equipped to combat this epidemic. This is why I am supporting Acadia's proposed non-residential opioid treatment program.

Bradley County is one of Tennessee's largest counties, and the need for this type of treatment is great. Acadia's proposed OTP would be the first of its kind in this region and would offer residents a more convenient and accessible substance abuse treatment option. Acadia's Comprehensive Treatment Center will include both medication and therapeutic interventions to help residents need overcome their substance abuse.

I support Acadia's proposed plan to bring treatment resources to the City of Cleveland, and I urge you to approve their application.

Sincerely,

Representative Dan Howell

House of Representatives
State of Tennessee
DAN HOWELL
REPRESENTATIVE 22ND DISTRICT

Bradley County is one of Tennessee's largest counties, and the need for this type of treatment is great. Acadia's proposed OTP would be the first of its kind in this region and would offer residents a more convenient and accessible substance abuse treatment option.

Strong Community Support: Representative Mark Hall



MARK HALL
STATE REPRESENTATIVE
24TH LEGISLATIVE DISTRICT
BRADLEY COUNTY

House of Representatives State of Tennessee

Mr. Logan Grant
Executive Director
Tennessee Health Services & Development Agency
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, TN 37243

Re: Cleveland Comprehensive Treatment Center, CN2005-016

Dear Mr. Grant:

On behalf of Bradley County residents in my district, I write this letter in support of Cleveland Comprehensive Treatment Center's certificate of need application to establish an opioid treatment program in Bradley County and the seven surrounding counties.

As Representative to District 24, including serving as a member of the House Mental Health and Substance Abuse Subcommittee, former Bradley County Commissioner, and a former Marine who currently co-chairs the South East Tennessee Veterans Home Council, I know all too well the devastation the opioid epidemic has caused and continues to cause in the eight counties Cleveland CTC proposes to serve. By combining patient-specific daily dosages of medication with comprehensive counseling and behavioral therapies, medication assisted treatment has consistently proven to be the most effective option for treating opioid dependence and allowing those with opioid use disorder to regain their lives. Yet, in Bradley County and across our state, easy access to opioid treatment programs remains a challenge.

Approving Cleveland CTC would help reverse this trend and add much needed treatment capacity for those battling opioid use disorder in Bradley and surrounding counties. I hope you will give Cleveland CTC's application your favorable consideration.

Sincerely,

Representative Mark Hall, District 24

582 CO
425
NASHVILLE

Rep.ma

Yet, in Bradley County and across our state, easy access to opioid treatment programs remains a challenge.

Approving Cleveland CTC would help reverse this trend and add much needed treatment capacity for those battling opioid use disorder in Bradley and surrounding counties.



House of Representatives State of Tennessee

MARK HALL
STATE REPRESENTATIVE
24TH LEGISLATIVE DISTRICT
BRADLEY COUNTY

Walter Presswood – Business Owner and Longtime Cleveland Resident



August 21, 2020

Tennessee Health Services and Development Agency
Logan Grant, Executive Director
502 Deadrick Street
Andrew Jackson Building, 9th Floor
Nashville, TN 37243

My name is Walter Presswood. I reside at 3300 North Ocoee, Cleveland, Tennessee and have lived in southeast Tennessee all 71 years of my life. Having been born in the foothills of the Appalachian mountains and attending a three-room school house, I have a sense of the values of the people of this region and am familiar with the struggles they face on a daily basis.

My wife was a public school teacher for 38 years and interacted with many families of all educational and economic backgrounds. Following my education at Cleveland State Community College, Tennessee Technological University, and West Virginia University, I have had a long and varied career including a foray into the world of Journalism, serving as a reporter and editor in community newspapers and daily publications. I was drawn to higher education and taught English, speech, and Journalism. For 19 years I was the public relations spokesman for Cleveland State Community College and executive director for the community college system's first public Foundation. I was a member of the Bradley County Board of Education for 11 years.

I recently started my 37th year as a small business owner, dealing in antiques. Over the years I have witnessed firsthand people coming into my shop trying to sell items, many times stolen, in order to buy drugs. I have seen families split and fortunes lost by people who got involved and addicted to the drugs. I have witnessed the physical deterioration of the addict's body. Our community also has a problem with theft and burglary, the majority of which is closely related to the drug problem. And, sadly, I have read many obituaries of young and middle aged people in the prime of their lives who are gone too soon. Unfortunately, many families still consider addiction as an embarrassment, and the real cause of death is never published. That way, families don't have to answer questions, and the community doesn't have to deal with negative coverage and all its ramifications.

I strongly support the establishment of an Acadia Healthcare outpatient drug treatment program for Cleveland and Bradley County and firmly believe that it will help control the opioid problem and save many lives.

Sincerely,


Walter Presswood


Walter Presswood

I strongly support the establishment of an Acadia Healthcare outpatient drug treatment program for Cleveland and Bradley County and firmly believe that it will help control the opioid problem and save many lives.

Dustin Jones – Business Owner and Longtime Cleveland Resident



THE CRAFT OF SEATING

August 20, 2020

Tennessee Health Services and Development Agency
Logan Grant, Executive Director
502 Deaderick Street
Andrew Jackson Building, 9th Floor
Nashville, TN 37243

Mr. Grant,

My name is Dustin Jones, proud citizen of Cleveland TN for 52 years, local business owner, spouse to a professional educator of 28 years and proud father of 2 bright, successful children, 20 and 24 years of age, both UT Vols.

Cleveland and the surrounding area, was a great location to rear our children. Low crime, unemployment, great people and beautiful surroundings. Through the years, while enjoying the area, we have been very fortunate to travel abroad to many destinations to share the world with our children, from luxurious areas of the Amalfi Coast to living in the Medinas of Morocco, each with their own life lessons, but always being able to come back to our safe harbor of Cleveland TN.

As times moved forward, our safe harbor has been under attack. I never imagined, little ole' Cleveland would ever have such issues, from our own opioid epidemic to extreme meth addiction, both leading to a higher crime rate - such a pity. We always assumed these were "big city" problems that we left behind, but now know we must face these issues in our own community. We never, ever realized how much we were sheltered.

Addiction to these high caliber narcotics is treatable, but not without the proper facilities, staffing and patient-centered approach that an Acadia Healthcare, Non-Residential Opioid Treatment Center for Cleveland could ultimately provide.

In closing, my family and I believe that every human has a right to exist, be healthy and contribute to society, and with the proper resources, i.e. new drug treatment center/s, those challenged by addiction can learn how to manage life and contribute to our local community, once again.

Go Cleveland and Go TN!

Sincerely,
Dustin Jones

Founder / CEO
Director of Business Development
423.303.8188 cell / djones@ekocontract.com

eko-The Craft of Seating 145 Rymer Road NE Cleveland TN 37323 866.814.8356

Addiction to these high caliber narcotics is treatable, but not without the proper facilities, staffing and patient-centered approach that an Acadia Healthcare, Non-Residential Opioid Treatment Center for Cleveland could ultimately provide.



THE CRAFT OF SEATING

Dustin Jones

Founder / CEO
Director of Business Development
423.303.8188 cell / djones@ekocontract.com

Improving Unmet Treatment Need



*Even with the approval of Cleveland CTC, the service area will remain in **high need** of OTPs, only meeting **16%** of patients' needs.*

Service Area County	Current # Pts Treated in OTPs	Estimated # Pts Cleveland CTC (Y2)	Reduction in Pts Treated at Volunteer Treatment Center	Resulting # Pts in OTP Treatment	Total Pts in Need of OUD Treatment	% Need Met
Bradley	182	130	(111)	201	955	21.0%
Loudon	71	26	(22)	75	496	15.1%
McMinn	60	36	(31)	65	481	13.5%
Meigs	15	6	(5)	16	111	14.4%
Monroe	34	7	(6)	35	424	8.3%
Polk	9	9	(8)	10	156	6.4%
Rhea	56	32	(27)	61	293	20.8%
Roane	83	18	(15)	86	488	17.6%
Total	510	264	(225)	549	3,405	16.1%

Improving Unmet Treatment Need



*Even with the approval of Cleveland CTC and TLC Maryville, the service area will remain in **need** of OTPs, only meeting **20%** of patients' needs.*

Service Area County	Current # Pts Treated in OTPs	Estimated # Pts TLC Maryville (Y2) *	Estimated # New Pts Cleveland CTC**	Resulting # Pts in OTP Treatment	Total Pts in Need of OUD Treatment	% Need Met
Bradley	182	0	51	233	955	24.4%
Loudon	71	30	10	111	496	22.4%
McMinn	60	20	14	94	481	19.5%
Meigs	15	0	2	17	111	15.3%
Monroe	34	30	3	67	424	15.8%
Polk	9	0	4	13	156	8.3%
Rhea	56	0	12	68	293	23.2%
Roane	83	0	7	90	488	18.4%
Total	510	80	103	693	3,405	20.4%

*Estimated number of TLC Maryville patients comes from CN1912-051 page 19.

**328 Cleveland CTC patients less 225 patients shifted from Volunteer Treatment Center in Chattanooga results in 103 new patients for Cleveland CTC.

Improving Accessibility to Treatment



Service Area County	City	Miles to Cleveland CTC	Miles to Volunteer Treatment Center	Miles to TLC Maryville	Miles to BHG Knoxville Bernard	Miles to BHG Knoxville Citico
Bradley	Cleveland	3.4	29.2	76.4	83.5	81.7
McMinn	Athens	27.2	55.9	41.8	58.5	56.7
Meigs	Decatur	29.6	58.3	59.3	66.4	64.6
Monroe	Madisonville	48.2	76.9	25.5	56.9	55.1
Polk	Benton	15.0	44.9	55.7	81.7	79.9
Rhea	Dayton	26.7	40.7	73.7	80.8	79.0

Economic Feasibility



- Modest start-up costs fully funded by Acadia Healthcare.
- Reasonable schedule of charges consistent with other providers.
- No admission fee or advance payments.
- High utilization beginning in Year One.
- Positive cash flow and operating margin early in Year One.
- Open to Medicaid and Medicare patients as soon as approved.
- Charity care offered to pregnant women.

Orderly Development



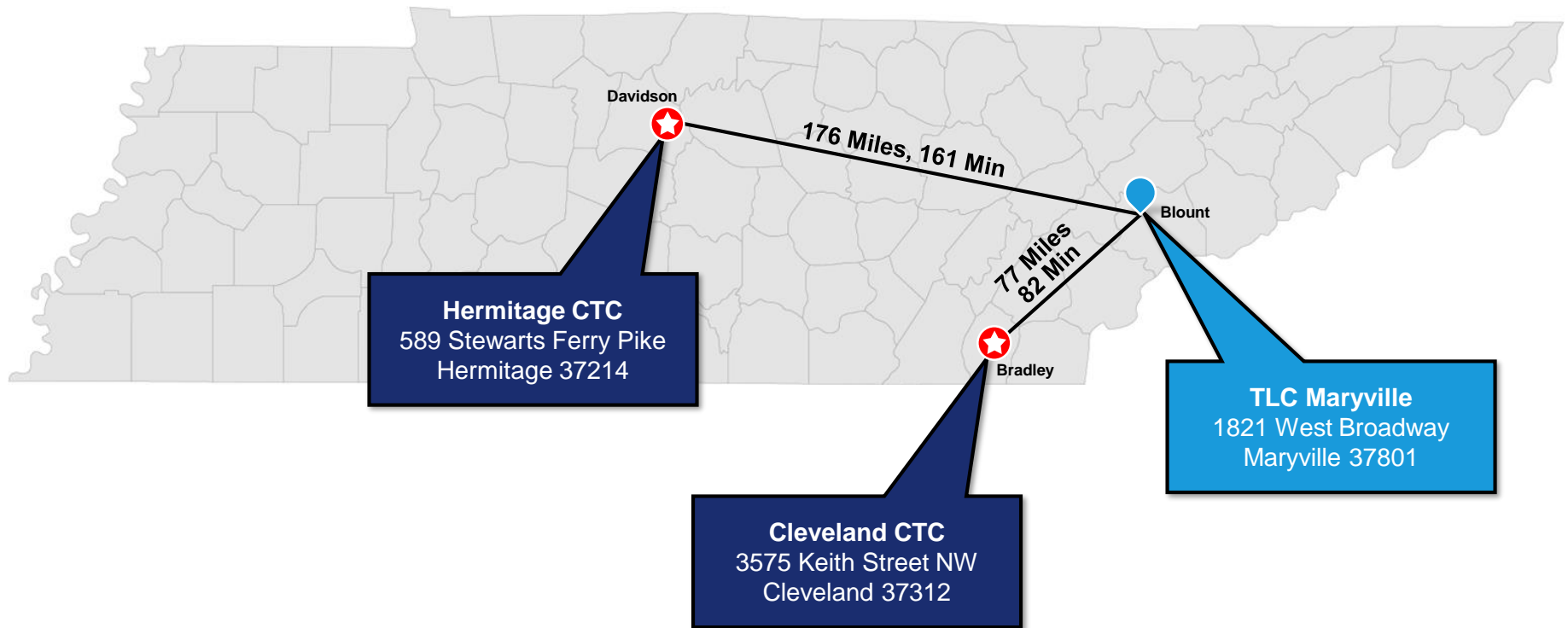
- Addresses documented health crisis in East Tennessee.
- Improves patient access in a rural service area and eases the travel burden on service area patients.
- Alleviates capacity concerns at Volunteer Treatment Center and enhances continuum of care.
- Led and supported by leading behavioral healthcare provider.
- Supported by community leaders and resource agencies in the service area.



*Cleveland
Comprehensive
Treatment Center*

An Integrated Approach to Patient Access

Serving Distinct Communities



Copycat Opposition



August 21, 2020

Logan Grant, Executive Director
Tennessee Health Services & Development Agency
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, Tennessee 37243

Dear Mr. Grant and Board Members of the HSDA:

It is with significant alarm that the Patricia Hall Talbott learned about Applications CN2005-14 and CN2005-16.

I write to oppose these applications under the criteria for based on the following:

Provide Healthcare that Meetings Appropriate Quality and CN2005-16

It was with great alarm that we were sent information pertaining to practices that span several years earlier this week. Attached

- **Attachment A** – Recent North Carolina state licensure deficiencies, and plans of correction for opioid treatment the parent company in the State of North Carolina
- **Attachment B** – Nationwide state and federal licensure deficiencies, and news media reports spanning pages appropriate quality standards back to at least 2007
- **Attachment C** – Official announcement from the U.S. than one year ago of the parent company's agreeing to settlement in West Virginia state history
- **Attachment D** – Settlement Agreement between Acacia Department of Justice
- **Attachment E** – Corporate Integrity Agreement between General of the U.S. Department of Health & Human

As such, we strongly oppose both CN2005-14 as well as CN2005-16. The parent company of these applications has a long and demonstrated history of inappropriate quality standards across their vast treatment

As recently as last year Acacia Healthcare entered into the settlement with the Department of Justice in West Virginia history. For

1821 West Broadway Avenue, Maryville, TN

Attachment B

Sampling of historical Acacia inspections and news media reports

All of the below contain hyperlinks. The heading is the Acacia-owned facility in question, the bullet points underneath the center name link direct to licensing audits that show specific deficiencies – contrary to the Tennessee quality assurance requirement to be awarded a CON – and/or news media reports related to that facility.

Acacia Montana Treatment Center (Butte, MT)

- [State Inspection Reports \(2014-2017\)](#)

Allentown Comprehensive Treatment Center (Allentown, PA)

- [State Inspection Reports \(2015-2017\)](#)

Appleton Comprehensive Treatment Center (Appleton, WI)

- [State Inspection Report \(2017\)](#)

Ascent Treatment and Outpatient Clinic (10 Facilities in Arkansas)

- [Boy, 5, Found Dead After Spending 8 Hours in Van Outside Children's Health Clinic: Cops \(2017\)](#)
- [Newspaper: MH Ascent vans twice had alarm trouble \(2017\)](#)
- [4 West Memphis Daycare Employees Charged With Manslaughter in Toddler's Hot Van Death \(2017\)](#)
- [Ascent Children's Closes all facilities](#)

Asheville Comprehensive Treatment Center (Asheville, NC)

- [State Inspection Report \(2018\)](#)

For consideration in review of the following:
CN2005-014 and CN2005-016

ACADIA EXPOSED

DESTRUCTIVE GREED presented by Marcus Aurelius Value



HOME TROUBLED FACILITIES DOCUMENTS ABOUT CONTACT

Documents

Over several months, we gathered and reviewed thousands of pages of public documents including over 600 state and federal inspection reports as well as court records, media reports, lawsuits, and police records. We have posted a substantial amount of these documents here for the benefit of the public.

Acacia Montana Treatment Center (Butte, MT)

- [State Inspection Reports \(2014-2017\)](#)

Allentown Comprehensive Treatment Center (Allentown, PA)

- [State Inspection Reports \(2015-2017\)](#)

Appleton Comprehensive Treatment Center (Appleton, WI)

- [State Inspection Report \(2017\)](#)

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- [Ascent Children's Closes all facilities](#)

Asheville Comprehensive Treatment Center (Asheville, NC)

- [State Inspection Report \(2018\)](#)

Bayside Marin Treatment Center (San Rafael, CA)

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Opposition Driven By Activist Investors “Short” in Acadia Stock



ACADIA EXPOSED
DESTRUCTIVE GREED presented by Marcus Aurelius Value

SEARCH...

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About

Marcus Aurelius Value is a pseudonym of an investor that focuses on researching companies that are misrepresenting themselves to investors. We are short Acadia Healthcare (NASDAQ: ACHC).

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JOIN

Marcus Aurelius Value is a pseudonym of an investor that focuses on researching companies that are misrepresenting themselves to investors. ***We are short Acadia Healthcare.***

ACADIA EXPOSED
DESTRUCTIVE GREED presented by Marcus Aurelius Value

SEARCH...

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Report

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WHISTLEBLOW
OBSERVED MISCONDUCT OR FRAUD AT AN A FACILITY?

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